

EXHIBIT 15

1
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE EASTERN DISTRICT OF VIRGINIA
4 ALEXANDRIA DIVISION

5 -----X
6 UNITED STATES, et al.,

7 PLAINTIFF,

8 -against-

9 Case No.:

10 1:23-CV-00108-LMB-JFA

11 GOOGLE, LLC,

12 DEFENDANT.

13 -----X

14 DATE: September 20, 2023

15 TIME: 9:30 A.M.

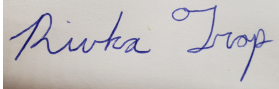
16 VIDEOTAPED DEPOSITION of LARA STOTT,
17 taken by the Defendant, pursuant to a Court
18 Order, held via videoconference, before
19 Rivka Trop, a Notary Public of the State of
20 New York.

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23
24
25 Job No. CS6097892

<p style="text-align: right;">Page 2</p> <p>1 2 A P P E A R A N C E S: 3 4 UNITED STATES DEPARTMENT OF JUSTICE Attorneys for the Plaintiff 5 UNITED STATES, ET AL 450 Fifth Street, N.W. 6 Washington, D.C. 20530 BY: KATHERINE CLEMONS, ESQ. 7 -and- 8 RACHEL ZWOLINSKI, ESQ. 9 -and- 10 ALVIN CHU, ESQ. 11 12 PAUL, WEISS, RIFKIND, WHARTON & GARRISON, LLP Attorneys for the Defendant 13 GOOGLE, LLC 2001 K Street, N.W. 14 Washington, D.C. 20006 BY: HEATHER MILLIGAN, ESQ. 15 -and- 16 MARTHA L. GOODMAN, ESQ. 17 18 ALSO PRESENT: ORSON BRAITHWAITE, Videographer 19 20 CAPTAIN MICHAEL ELLIS 21 * * * 22 23 24 25</p>	<p style="text-align: right;">Page 4</p> <p>1 L. STOTT 2 record. 3 MS. MILLIGAN: Heather Milligan 4 from Paul, Weiss, Rifkind, Wharton & 5 Garrison on behalf of Google. With me 6 is my colleague, Martha Goodman. 7 MS. CLEMONS: This is Katherine 8 Clemons, with the Department of 9 Justice, on behalf of the United States 10 and the witness. 11 MS. ZWOLINSKI: Rachel Zwolinski, 12 on behalf of the United States. 13 MR. CHU: Alvin Chu, on behalf of 14 the United States. 15 MR. ELLIS: Captain Michael Ellis, 16 Air Force Recruiting Service. 17 THE VIDEOGRAPHER: Will the court 18 reporter, please, swear in the witness. 19 L A R A S T O T T, called as a witness, 20 having been first duly sworn by a Notary 21 Public of the State of New York, was 22 examined and testified as follows: 23 EXAMINATION BY 24 MS. MILLIGAN: 25 Q. Please state your name for the</p>
<p style="text-align: right;">Page 3</p> <p>1 L. STOTT 2 THE VIDEOGRAPHER: Good morning we 3 are going on the record at 9:39 a.m., 4 on September 20, 2023. Please note 5 that the microphones are sensitive and 6 may pick up whispering, private 7 conversations, please mute your phones 8 at this time. Audio and video 9 recording will continue to take place 10 unless all parties agree to go off the 11 record. 12 This is media unit 1 of the 13 deposition Ms. Lara Stott in the matter 14 of United States et al. versus Google, 15 LLC, founded in the United States 16 District Court, Eastern District of 17 Virginia, Alexandria Division, Case No. 18 1:23-CV-00108-LMB-JFA. 19 My name is Orson Braithwaite from 20 Veritext Legal Solutions, and I am the 21 videographer. 22 The court reporter is Rivka Trop 23 from the firm Veritext Legal Solutions. 24 Counsel will now state their 25 appearances and affiliated for the</p>	<p style="text-align: right;">Page 5</p> <p>1 L. STOTT 2 record. 3 A. Lara Stott. 4 Q. Good morning, Ms. Stott. We met 5 the other day. 6 Just for the record, my name is 7 Heather Milligan, and I represent Google. 8 You are the senior strategic adviser for 9 marketing to the commander at Air Force 10 Recruiting Service, is that right? 11 A. Yes. 12 Q. Do you understand that you are 13 testifying today as a corporate 14 representative of the Air Force? 15 A. I do. 16 Q. In preparing for your testimony 17 today, did you review the overarching 18 contract between the Air Force and GSD&M? 19 A. Yes, I did. 20 MS. MILLIGAN: Can we go off the 21 record for just a minute. 22 THE VIDEOGRAPHER: The time is 23 9:41 a.m. We are off the record. 24 (Whereupon, an off-the-record 25 discussion was held.)</p>

<p style="text-align: right;">Page 54</p> <p>1 L. STOTT</p> <p>2 to that though as task order 28.</p> <p>3 Q. Could you clarify?</p> <p>4 A. So that is the call number of the</p> <p>5 actual contract. But each individual task</p> <p>6 order has a number that started with 1 and</p> <p>7 continues to go up under the current</p> <p>8 contract. And on page ending in 00003 you</p> <p>9 will see at the top it says there FY20</p> <p>10 special warfare combat support advertising</p> <p>11 task order 0028.</p> <p>12 I am just telling you that is how</p> <p>13 we reference them.</p> <p>14 Q. You could set that aside.</p> <p>15 How did the Air Force become</p> <p>16 involved in this litigation?</p> <p>17 A. I would need to refer to my notes,</p> <p>18 one second.</p> <p>19 On December 23 of 2022, Michael</p> <p>20 Wolin with the Department of Justice</p> <p>21 e-mailed the Department of Defense Office of</p> <p>22 General Counsel, Sivram Prasad. And then</p> <p>23 Sivram Prasad then contacted the Air Force</p> <p>24 on December 23. And then internally that</p> <p>25 communication reached Mr. Barry Dickey at</p>	<p style="text-align: right;">Page 56</p> <p>1 L. STOTT</p> <p>2 Counsel for the Department of Defense?</p> <p>3 MS. CLEMONS: Objection to form.</p> <p>4 A. Yes, the Air Force was directed by</p> <p>5 the DOD Office of General Counsel.</p> <p>6 Q. Did Air Force conduct any</p> <p>7 investigation before -- strike that.</p> <p>8 Did Air Force conduct any</p> <p>9 investigation into the claims and</p> <p>10 allegations made in the complaint prior to</p> <p>11 deciding to participate in this lawsuit?</p> <p>12 MS. CLEMONS: Objection to form,</p> <p>13 foundation.</p> <p>14 A. Our involvement by Air Force, Big</p> <p>15 Air Force did not become involved until</p> <p>16 December 23 and Air Force Recruiting Service</p> <p>17 not until January 12 of 2023. That was the</p> <p>18 beginning of our involvement.</p> <p>19 Q. What did Air Force tell its ad</p> <p>20 agency, GSD&M, about this lawsuit?</p> <p>21 MS. CLEMONS: Objection to form,</p> <p>22 foundation.</p> <p>23 A. I did not have any conversations</p> <p>24 with Ms. Dickey or with Ms. Hatch about how</p> <p>25 GSD&M was notified or involved.</p>
<p style="text-align: right;">Page 55</p> <p>1 L. STOTT</p> <p>2 Air Force Recruiting Service on January 12</p> <p>3 of 2023.</p> <p>4 Q. Is Air Force involved in this</p> <p>5 litigation -- strike that.</p> <p>6 Prior to outreach by Michael</p> <p>7 Wolin, did Air Force have any plans to sue</p> <p>8 Google based on anything relating to the</p> <p>9 subject matter of the complaint?</p> <p>10 MS. CLEMONS: Objection to form.</p> <p>11 A. No, our first involvement or first</p> <p>12 notification there was on December 23, 2022.</p> <p>13 Q. Did Air Force have a choice to</p> <p>14 participate in this litigation?</p> <p>15 MS. CLEMONS: Objection to form.</p> <p>16 A. That was directed by the</p> <p>17 Department of Defense, Office of General</p> <p>18 Counsel.</p> <p>19 Q. Are you saying that the decision</p> <p>20 to participate in this litigation -- strike.</p> <p>21 Are you saying that Air Force's</p> <p>22 decision -- strike that.</p> <p>23 Are you saying that Air Force's</p> <p>24 participation in this litigation is due to a</p> <p>25 decision made by the Office of General</p>	<p style="text-align: right;">Page 57</p> <p>1 L. STOTT</p> <p>2 I can't really say if DOD reached</p> <p>3 out to them directly or if that notification</p> <p>4 came from Air Force Recruiting Service, but</p> <p>5 I don't know.</p> <p>6 Q. What facts are Air Force aware of</p> <p>7 regarding Google's alleged monopolization?</p> <p>8 MS. CLEMONS: Object to the extent</p> <p>9 that calls for privileged</p> <p>10 communications with counsel. If you</p> <p>11 could answer without referring to</p> <p>12 privileged communications with counsel,</p> <p>13 you may do so.</p> <p>14 A. That would all have been</p> <p>15 conversations with counsel.</p> <p>16 Q. Ms. Stott, what did you do to</p> <p>17 prepare for today's deposition?</p> <p>18 A. I had probably eight to ten</p> <p>19 meetings with counsel. I reviewed multiple</p> <p>20 documents and spent a total of about 60</p> <p>21 hours either reviewing documents or having</p> <p>22 conversations with people internal at</p> <p>23 Recruitment Service Marketing including</p> <p>24 Ms. Hatch, Mr. Dickey, Maj. Lane. I also</p> <p>25 spoke with Maj. Brian Murray and Ms. Larisa</p>

15 (Pages 54 - 57)

<p style="text-align: right;">Page 62</p> <p>1 L. STOTT 2 DECLARATION 3 4 I hereby certify that having been first 5 duly sworn to testify to the truth, I gave 6 the above testimony. 7 8 I FURTHER CERTIFY that the foregoing 9 transcript is a true and correct transcript 10 of the testimony given by me at the time and 11 place specified hereinbefore. 12 13 14 15 _____ 16 LARA STOTT 17 18 Subscribed and sworn to before me 19 this ____ day of _____ 20____. 20 21 22 _____ 23 NOTARY PUBLIC 24 25</p>	<p style="text-align: right;">Page 64</p> <p>1 L. STOTT 2 CERTIFICATE 3 4 STATE OF NEW YORK) : SS.: 5 COUNTY OF QUEENS) 6 7 I, RIVKA TROP, a Notary Public for and 8 within the State of New York, do hereby 9 certify: 10 That the witness whose examination is 11 hereinbefore set forth was duly sworn and 12 that such examination is a true record of 13 the testimony given by that witness. 14 I further certify that I am not related 15 to any of the parties to this action by 16 blood or by marriage and that I am in no way 17 interested in the outcome of this matter. 18 IN WITNESS WHEREOF, I have hereunto set 19 my hand this 20th day of September, 2023. 20 21 22  23 RIVKA TROP 24 25</p>
<p style="text-align: right;">Page 63</p> <p>1 L. STOTT 2 3 INDEX 4 5 EXAMINATION BY PAGE 6 MS. MILLIGAN 4 MS. CLEMONS 59 7 EXHIBITS 8 9 STOTT EXHIBITS EXHIBIT EXHIBIT 10 LETTER DESCRIPTION PAGE 11 12 126 Document bearing Bates 6 USAF-ADS-000041-6385 13 127 Document bearing Bates 7 USAF-ADS-000077-1834 14 128 Document bearing Bates 12 USAF-ADS-000061-8109 15 129 Document bearing Bates 29 USAF-ADS-000077-1565 16 17 130 Document bearing Bates 39 USAF-ADS-000077-1759 18 131 Document Bates No. 46 USAF-ADS-0000013224 19 20 21 133 Document bearing Bates 47 USAF-ADS-000084-8189 22 132 Document bearing Bates 53 USAF-ADS-000077-1515 23 24 134 Notes 58 (Exhibits retained by counsel.) 25</p>	